

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MAHMOUD KHALIL, *et al.*,

*Plaintiffs,*

v.

THE TRUSTEES OF COLUMBIA UNIVERSITY  
IN THE CITY OF NEW YORK, *et al.*,

*Defendants.*

Case No. 1:25-cv-02079-AS

**DECLARATION OF TODD B. TATELMAN IN SUPPORT OF  
CONGRESSIONAL DEFENDANTS' MOTION TO DISMISS**

I, Todd B. Tatelman, pursuant to the provisions of 28 U.S.C. § 1746 declare and say:

1. I am the Deputy General Counsel in the Office of General Counsel of the U.S. House of Representatives. I have served in this capacity since 2018, and have served in the Office of General Counsel since 2011. I represent the Honorable Tim Walberg and the Committee on Education and Workforce of the U.S. House of Representatives in this matter.

2. Attached as Exhibit A<sup>1</sup> is a true and correct copy of Letter from Rep. Virginia Foxx, Chairwoman, H. Comm. on Education and the Workforce, to Dr. Minouche Shafik, President, Columbia Univ., et al. (Feb. 12, 2024).

3. Attached as Exhibit B is a true and correct copy of Letter from Rep. Virginia

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<sup>1</sup> For the Court's and the parties' convenience, the exhibits attached here were also attached to the Declaration of Todd B. Tatelman, ECF No. 32, which was filed in support of Congressional Defendants' Opposition to Plaintiffs' Motion for a Temporary Restraining Order and Preliminary Injunction in this matter, ECF No. 31, and they are labeled consistently with the exhibits to that declaration.

Foxx, Chairwoman, H. Comm. on Education and the Workforce, to Dr. Minouche Shafik, President, Columbia Univ., et al. (Apr. 21, 2024).

4. Attached as Exhibit C is a true and correct copy of Letter from Rep. Virginia Foxx, Chairwoman, H. Comm. on Education and the Workforce, to Dr. Minouche Shafik, President, Columbia Univ., et al. (Aug. 1, 2024).

5. Attached as Exhibit D is a true and correct copy of Letter from Rep. Virginia Foxx, Chairwoman, H. Comm. on Education and the Workforce, to Dr. Katrina Armstrong, Interim President, Columbia Univ. (Aug. 21, 2024).

6. Attached as Exhibit E is a true and correct copy of Letter from Rep. Tim Walberg, Chairman, H. Comm. on Education and Workforce, to Dr. Katrina Armstrong, Interim President, Columbia Univ., et. al. (Feb. 13, 2025).

7. Attached as Exhibit F is a true and correct copy of Letter from Karen Elizabeth Christian, Couns. for Columbia Univ., to Rep. Tim Walberg, Chairman, H. Comm. on Education and Workforce (Feb. 27, 2025).

8. Attached as Exhibit G is a true and correct copy of Letter from Karen Elizabeth Christian, Couns. for Columbia Univ., to Rep. Tim Walberg, Chairman, H. Comm. on Education and Workforce (Mar. 7, 2025).

9. Attached as Exhibit H is a true and correct copy of Letter from Karen Elizabeth Christian, Couns. for Columbia Univ., to Rep. Tim Walberg, Chairman, H. Comm. on Education and Workforce (Mar. 19, 2025).

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 23, 2025 in Washington, D.C.

/s/ Todd B. Tatelman  
Todd B. Tatelman